

IN REPLY REFER TO: FWS/RIFO

## United States Department of the Interior

## FISH AND WILDLIFE SERVICE Rock Island Field Office 1511 47<sup>th</sup> Avenue

Moline, Illinois 61265 Phone: (309) 757-5800 Fax: (309) 757-5807



March 31, 2010

Ms. Pamela Blakley Chief Air Permits Section U.S. Environmental Protection Agency 77 West Jackson Boulevard Chicago, Illinois 60604-3590

Dear Ms. Blakley:

This responds to your March 17, 2010 letter with attached biological evaluation for the Prevention of Significant Deterioration (PSD) permit related to the Keystone Steel and Wire Company facility located in Peoria, Illinois. You requested our concurrence on your effects determination pursuant to Section 7 of Endangered Species Act. We have reviewed the information provided in the biological evaluation. We concur with your findings that approval of this PSD permit will not likely adversely affect the federally listed species in the action area as defined in the biological evaluation.

The biological evaluation included a variety of analyses that we used to support our concurrence. The analyses included the results of air modeling and exposure analysis for sulfur dioxide in the atmosphere, and acid fog or mist. We have not reviewed the air model methods or results and depend on your agency and the state agency for this technical review and approval. The analyses included a comparison of the predicted maximum concentrations of sulfur dioxide in the atmosphere and acid precipitation on plants to ecological toxicity reference values published in the technical literature.

Based on these analyses, we conclude that local flora and fauna, including federally listed species, will be exposed to increased sulfur dioxide and lower pH conditions from the new emissions at this facility. However, the specific exposure we believe, based on the best available information, will not elicit a detectable adverse response from the listed species. In addition, the increment of change, when added to the existing baseline or background condition, is not likely to negatively affect the survival or reproduction of any federally listed species within the action area.

An analysis of the cumulative effects from emissions at this facility combined with emissions at other facilities outside of the action area is beyond the scope of this Section 7 review and was not evaluated.

This precludes the need for further action on this project as required under Section 7 of the Endangered Species Act of 1973, as amended. Should the project be modified or new information indicate endangered species may be affected, consultation should be initiated. This letter provides comments under the authority of and in accordance with provisions of the Endangered Species Act of 1973, as amended (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*)

Thank you for the opportunity to coordinate with you on this matter. Please feel free to call me at extension 201 or Mike Coffey of my staff at extension 206 if you have any questions or wish to discuss this further.

Sincerely,

Richard C. Nelson Field Supervisor

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